

WILKES & McHUGH, P.A.  
ATTORNEYS AT LAW

TAMPA COMMONS  
ONE NORTH DALE MABRY  
SUITE 601  
TAMPA, FLORIDA 33609

(813) 873-0026  
1-800-255-5070  
FAX (813) 286-8820

June 24, 2004

Brant Levine  
Federal Election Commission  
999 E Street, Northwest  
Washington, D.C. 20463

Re: MUR 5454 (Wilkes & McHugh, P.A.)

Dear Mr. Levine:

Please accept this letter as my response to your letter of June 1, 2004 regarding a complaint filed with the Federal Elections Commission.

Please be advised that a similar complaint was filed on May 30, 2003, based upon the exact same newspaper article and others. That complaint number was MUR 5366 (Wilkes & McHugh, P.A.).

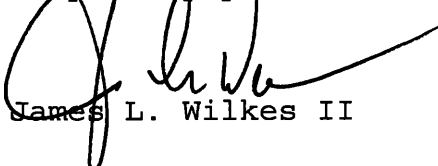
A response was filed to that complaint. That response is attached to this letter and should be considered as a response to this complaint.

A letter was received from the Federal Elections Commissioner dated April 29, 2004, stating that the commission found that "there was no reason to believe that Wilkes & McHugh, P.A. had violated the Act in this matter. Further, the Commission closed its file in this matter. (see attached letter)

Since these exact allegations have been investigated once by the Federal Elections Commission, and the matter resolved in our favor and the file closed without further action, it would be an abuse of due process to open a new investigation based upon the exact same allegations.

Please advise once you have reviewed this letter and the accompanying correspondence.

Very truly yours,

  
James L. Wilkes II

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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2004 JUN 25 1 P 12 3

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**WILKES & McHUGH, P.A.**  
ATTORNEYS AT LAW

TAMPA COMMONS  
ONE NORTH DALE MABRY  
SUITE 601  
TAMPA, FLORIDA 33609

June 25, 2003

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FAX: (813) 286-8820

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2003 JUN 26 A 10:31

Jeff S. Jordan  
Federal Election Commission  
999 E Street, Northwest  
Washington, D.C. 20463

Re: MUR 5366

Dear Mr. Jordan

Please accept this letter in response to your letter concerning the "complaint" filed with the Federal Elections Commission by the American Conservative Union. Neither the "complaint" nor the attached articles make any specific allegations against Wilkes & McHugh. One article, in a publication called The Hill, stated, that Elaine Reeves gave \$2,000.00 to Edwards, and that she is an Office Manager at Wilkes & McHugh, a Tampa based firm specializing in Nursing Home abuse litigation. It also stated that Elaine Reeves contributed \$1,000.00 to Clinton-Gore, that her husband also contributed \$2,000.00 to Edwards, but that she and her husband are registered Republicans. It further stated that she and her husband bought a home for \$99,000.00 in 1996, with a mortgage of \$94,000.00 and an assessed value of \$95,352.00, suggesting by implication that she and her husband could not afford to make the contributions they made.

None of the other articles mention Wilkes & McHugh or Elaine Reeves.

Elaine Reeves has worked for Wilkes & McHugh for 18 years. Mrs. Reeves earned approximately last year. She has not been reimbursed for her contribution to the Edwards Campaign. She has not been promised any reimbursement. The firm of Wilkes & McHugh has no intention of reimbursing her for her contribution. She contributed of her own free will.

It is offensive that a political organization like American Conservative Union is attempting to use the Federal Election Commission to investigate contributions to a candidate like John Edwards who espouses positions directly contrary to theirs.

John Edwards has fought for the rights of the common citizen first as a trial lawyer, and now as a Senator and candidate for President. The current administration has made it clear that it is an adversary of trial lawyers and the current civil tort system in this

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June 25, 2003

Jeff S. Jordan

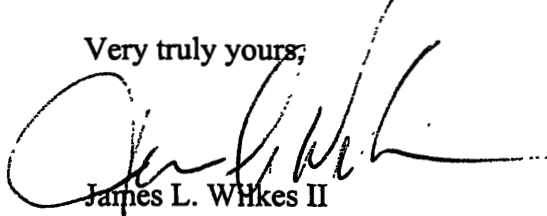
Page Two

country. It should come as no surprise that Elaine Reeves would support John Edwards since she has worked for a firm of trial lawyers for the last 18 years.

Regardless of one's personal position on these issues, the American Conservative Union should not be allowed to abuse the process of the Federal Elections Commission by filing an unfounded complaint against Wilkes & McHugh and Elaine Reeves based upon an article that itself is vague and full of innuendo.

Wilkes & McHugh requests that this matter be closed without any further investigation.

Very truly yours,

A handwritten signature in black ink, appearing to read "James L. Wilkes II", is written over a horizontal line.

James L. Wilkes II

26044142889

ELAINE L. REEVES  
LUTZ, FLORIDA 33559

June 24, 2004

Brant Levine  
Federal Election Commission  
999 E Street, Northwest  
Washington, D.C. 20463

Re: MUR 5454 (Elaine L. Reeves)

Dear Mr. Levine:

Please accept this letter as my response to your letter of June 1, 2004 regarding a complaint filed with the Federal Elections Commission.

Please be advised that a similar complaint was filed on June 6, 2003, based upon the exact same newspaper article and others. That complaint number was MUR 5366 (Elaine L. Reeves).

A response was filed to that complaint. That response is attached to this letter and should be considered as a response to this complaint.

A letter was received from the Federal Elections Commissioner dated April 29, 2004, stating that the commission found that "there was no reason to believe that I had violated the Act in this matter. Further, the Commission closed its file in this matter. (see attached letter)

Since these exact allegations have been investigated once by the Federal Elections Commission, and the matter was resolved in my favor and the file closed without further action, it would be an abuse of due process to open a new investigation based upon the exact same allegations.

Please advise once you have reviewed this letter and the accompanying correspondence.

Very truly yours,

  
Elaine L. Reeves

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COUNSEL

2004 JUN 25 P 12:53

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Elaine L. Reeves  
Lutz, Florida 33559

June 25, 2003

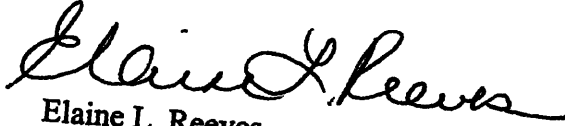
Jeff S. Jordan  
Federal Election Commission  
999 E Street Northwest  
Washington, D.C. 20463

Re: MUR 5366

Dear Mr. Jordan:

Please accept this letter and the attached affidavit as my response to your letter dated June 6, 2003.

Very truly yours,

  
Elaine L. Reeves

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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2003 JUN 26 A 10:31

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**AFFIDAVIT OF ELAINE L. REEVES  
RE: MUR 5366**

**State of Florida  
County of Hillsborough**

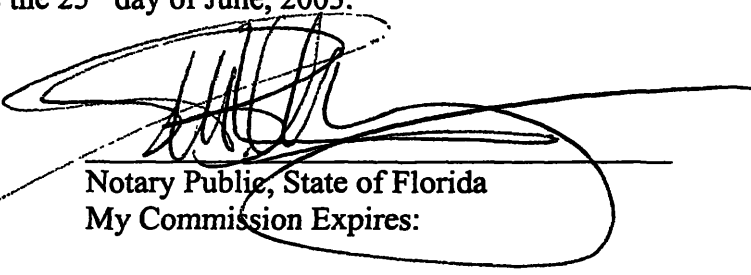
Now comes, Elaine L. Reeves, being first duly cautioned and sworn, who deposes and says as follows:

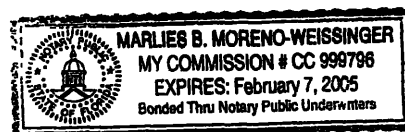
1. I made a contribution to the Edwards for President campaign because I freely chose to do so. I consider him to be an advocate for the type of person that I have devoted my career to serving. He supports the system of civil justice that I believe in.
2. I have worked at the firm of Wilkes & McHugh for 18 years. I am the Office Manager for the main office in Tampa, Florida. I have not received, been offered, or expect to receive any reimbursement for my contribution to the Edwards for President campaign.
3. I have the resources to make the contribution I made to Senator Edwards.
4. I am deeply concerned and offended that I am being asked to explain and justify my contribution. My personal assets as well as my reasons for contributing to Senator Edwards should be kept confidential and private.

FURTHER AFFIANT SAYETH NAUGHT

  
Elaine L. Reeves

SWORN TO and subscribed before me the 25<sup>th</sup> day of June, 2003.

  
Notary Public, State of Florida  
My Commission Expires:



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